



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

May 15, 2018

**BY ELECTRONIC MAIL**

Andrew C. Karpf  
Laurence Silverman & Associates  
1772 E. Jericho Turnpike, #2  
Huntington, NY 11743

**Re:    *United States v. Thomas Carrano, 17 Cr. 460 (DAB)***

Dear Counsel:

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, the Government hereby provides notice that it may call Senior Deputy Richard Samuels of the Spotsylvania County Sheriff's Office as an expert witness to testify regarding cockfighting. Although the Government believes that Deputy Samuel's testimony is otherwise admissible as non-expert testimony, the Government nonetheless provides notice regarding his testimony in an abundance of caution.

The Government expects to call Deputy Richard Samuels of the Spotsylvania County Sheriff's Office to testify at trial. Deputy Samuels has worked at the Spotsylvania Sheriff's Office for approximately 18 years and currently serves as Senior Deputy in the Animal Control Division. In or about 2013, Deputy Samuels was cross designated as a Deputy United States Marshal and has participated in dozens of federal and state investigations into animal cruelty and cockfighting. Deputy Samuels has attended multiple national training programs regarding animal cruelty investigations. In addition, Deputy Samuels has acted in an undercover capacity in cockfighting investigations and, in his capacity as an undercover officer, attended hundreds of cockfights. A copy of his *curriculum vitae* is enclosed with this notice.

Deputy Samuels will provide testimony regarding the nature of cockfighting and the terminology used in cockfighting based on his personal observations from his attendance at hundreds of cockfights, his training in animal cruelty investigations, and his observations as an undercover officer engaged in cockfighting investigations, including undercover communications with individuals involved in cockfighting activity. Specifically, Deputy Samuels will testify regarding:

- The training of cockfighting birds, including the use of "keeps," sparring matches, muffs, fly-pens, and other equipment.
- The use of knives, gaffs, and other sharp instruments at a cockfight.
- The activities at cockfights, including the types of roosters typically fought at cockfights; the injuries suffered by the roosters during a cockfight; and the means and methods by which roosters are fought at a cockfight.

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- The “lingo” and other terms of communication used by cockfighters when describing their involvement at a cockfight (including describing the events as “shows” and describing a series of fights as “derbies”).
- The methods by which cockfighters attempt to evade law enforcement detection (including the use of sponsors to gain admission to fights and the use of coded language to describe cockfights).

The Government reserves the right to supplement this disclosure. Should the Government identify additional experts to testify at trial, the Government will provide prompt notice consistent with the Federal Rules of Criminal Procedure.

Very truly yours,

GEOFFREY S. BERMAN  
United States Attorney

By: \_\_\_\_\_ /s/

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## U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
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New York, New York 10007

June 6, 2018

**BY ELECTRONIC MAIL**

Andrew C. Karpf, Esq.  
Peter Bark, Esq.  
Laurence Silverman & Associates  
1772 E. Jericho Turnpike, #2  
Huntington, NY 11743

**Re:     *United States v. Thomas Carrano, 17 Cr. 460 (DAB)***

Dear Counsel:

On May 15, 2018, the Government provided notice, pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, that the Government may call Senior Deputy Richard Samuels of the Spotsylvania County Sheriff's Office as an expert witness to testify regarding cockfighting. In that notice, the Government provide the defendant with a summary of Deputy Samuels's expected testimony, the bases for his testimony, and Deputy Samuels's qualifications. Although the Government believes such notice satisfies the requirements of Rule 16, the Government provides the following supplemental disclosure summarizing the expected testimony of Deputy Samuels:

- Cockfighting is an activity where two gamefowl are placed into a pit, armed with sharp weapons of different varieties (*e.g.*, gaffs and knives), and fight to the death. A cockfight is officiated by a referee.
- A gaff is a curved metal pick similar to an ice pick with leather straps for affixing onto the trimmed spur of a rooster.
- Roosters are dubbed in preparation for cockfighting, including the removal of the comb and wattle, and the trimming of the spur.
- Gaffs are used in cockfights to increase the damage to the opponent rooster. The type of gaff used in a fight will alter the expected duration of a cockfight.
- Roosters injured during the course of a cockfight may receive limited medical treatment so that they may continue with a fight.
- A "keep" is a training regimen used to prepare gamefowl for a cockfight. Keeps vary in duration and type of exercises. Some typical exercises used during a keep include sparring, back drops, fly pens, and other training methods.

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- A “derby” is a cockfight in which a competitor will bring multiple roosters to fight. Fights typically occur in a main pit, but may be moved to a secondary “drag” pit.
- Cockfights are commonly referred to as “shows” and will frequently require an individual to sponsor or vouch for another individual in order for that secondary individual to be permitted to attend the fight.

The Government reserves the right to supplement this disclosure. Should the Government identify additional experts to testify at trial, the Government will provide prompt notice consistent with the Federal Rules of Criminal Procedure.

Very truly yours,

GEOFFREY S. BERMAN  
United States Attorney

By: \_\_\_\_\_/s/

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